

Exhibit E

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:

(202) 326-7999

MILBERG TADLER PHILLIPS GROSSMAN^{LLP}

One Pennsylvania Plaza 19th Floor • New York, NY 10119 • 212.594.5300 • F 212.868.1229 • www.milberg.com

September 6, 2018

Via Electronic Mail

Brian Ross, Esq.
Gibbs & Bruns LLP
1100 Louisiana
Suite 5300
Houston, TX 77002

Re: *In re Dealer Management Systems Antitrust Litigation*, MDL No. 2817

Dear Brian:

I am writing in response to your July 30, 2018 letter regarding Reynolds' improper redactions. It appears that Reynolds has re-reviewed the 105 documents listed in our July 16, 2018 letter, as your letter discusses the particular content of four of the emails. Reynolds then offers to re-produce "in accordance with the Federal Rules" any of the 105 documents that Reynolds determines to have improper redactions. However, we still have not received any production with altered redactions. When will Reynolds produce those documents?

Reynolds further states that any documents remaining redacted will be described "at the appropriate time" on a privilege log. We do not believe there is any basis for Reynolds to delay justifying its redactions for these documents until the November 2, 2018 deadline for privilege logs, especially considering that we requested this information by letter on July 16, 2018. When will Reynolds provide the requested information?

Finally, with respect to the two emails between Bob Schaefer and Bob Brockman regarding Authenticom (REYMDL00132467 and REYMDL00138480), Reynolds asserts that the redacted portions "are clearly privileged summaries of legal advice sought and received by Reynolds's outside legal counsel." That conclusory assertion of privilege is plainly insufficient, and we intend to move to compel production of the documents in unredacted form. If Reynolds intends to provide further justification for its assertion of privilege over these documents, please do so by September 10, 2018.

Best regards,

s/ Michael N. Nemelka

Mike Nemelka

s/ Peggy J. Wedgworth

Peggy J. Wedgworth

CC: MDL Counsel Email List